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state transportation of oil should be held common carriers. The act was construed to apply to all pipe lines which transported oil from other wells but their own, irrespective of whether they professed to carry for the public. *Held*, that the act, so construed, is constitutional. *United States v. Ohio Oil Co.*, 34 Sup. Ct. 956.

For a discussion of this case in the lower court, see 26 HARV. L. REV. 631. For an analysis in connection with the Insurance Rate Case, see NOTES, p. 84.

CONSTITUTIONAL LAW — PERSONAL RIGHTS — LIBERTY TO CONTRACT — LEGISLATIVE MINIMUM WAGE FOR WOMEN AND MINORS. — A state legislature passed an act creating a commission to declare standards of conditions of labor, hours of labor and minimum wages for women and minor workers in any industry. Failure of an employer to comply with the standards thus to be imposed was made a misdemeanor. Suit was brought to enjoin enforcement of a ruling of the commission fixing a minimum wage for women employed in factories. *Held*, that the act is constitutional. *Stettler v. O'Hara*, 139 Pac. 743 (Ore.).

For a discussion of this case and a comparison of the principles involved in minimum wage and maximum hours statutes, see this issue of the REVIEW, p. 89.

CONSTITUTIONAL LAW — POWERS OF LEGISLATURE: DELEGATION OF POWERS — DELEGATION OF POWER TO ADMINISTRATIVE OFFICIALS. — The Legislative Assembly of Porto Rico by statute levied a license tax on certain businesses and empowered the Insular Treasurer to classify each one of such businesses into one of five classes based on its importance and volume in comparison with other businesses. The defendant, an officer of a company taxable under this statute, refused to furnish the Treasurer with accounts necessary to assist him in his classification; whereupon mandamus was brought and resisted on the ground that the statute was unconstitutional. *Held*, that the writ of mandamus should be issued. *People of Porto Rico v. Neagle*, Sup. Ct. P. R., Aug. 1, 1914 (not yet reported).

For a discussion of the interesting question in administrative law here involved, see this issue of the REVIEW, p. 95.

CONSTITUTIONAL LAW — PRIVILEGES, IMMUNITIES AND CLASS LEGISLATION — VALIDITY OF STATE ANTI-TRUST ACT EXEMPTING COMBINATIONS OF LABOR. — The Missouri Anti-Trust Acts, as interpreted by the Supreme Court of the state, applied only to combinations of manufacturers and vendors and exempted associations of wage-earners from the statutory prohibitions against combinations to lessen competition and regulate prices. *Held*, that the statutes, as interpreted, do not violate the constitutional guaranty of equal protection of the laws. *International Harvester Co. v. Missouri*, 34 Sup. Ct. 859.

The Fourteenth Amendment does not prohibit a state legislature from passing acts regulating certain classes of persons and property and leaving others unregulated. *Soon Hing v. Crowley*, 113 U. S. 703. The laws may also operate differently upon the various classes, but the classification must be based upon a reasonable difference in the subjects of the legislation and must apply equally to all members of the classes defined. *Barbier v. Connolly*, 113 U. S. 27, 31. And it is not enough to invalidate the statute that the court does not think its policy a wise one. *Missouri Pacific Ry. Co. v. Humes*, 115 U. S. 512. The difficulty arises in deciding when the legislative classification has become vicious. The older cases drew the line much more narrowly than we find it drawn in the principal case. Thus the Illinois Anti-Trust Act was declared